

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHICAGO TRUCK DRIVERS, HELPERS AND )  
WAREHOUSE UNION (INDEPENDENT) )  
PENSION FUND, a Trust, and JACK STEWART, )  
its Fund Manager and one of its Trustees, )  
  )  
  ) Case No. 08 C 3954  
Plaintiffs,                                  )  
  ) Judge Darrah  
  )  
v.    ) Magistrate Judge Denlow  
  )  
  )  
LLA CONSTRUCTION HOLDING, INC., an )  
Illinois Corporation f/k/a ALL Construction Co., )  
Inc. and a/k/a A.L.L. Construction Co., Inc. )  
  )  
  )  
Defendant.                                    )

**MOTION FOR DEFAULT AND DEFAULT JUDGMENT**

Plaintiffs move the Court under Fed.R.Civ.P. ("Rule") 55(b) for an order directing the Clerk of the Court to enter a default and default judgment against Defendant. Plaintiffs state in support:

1. On July 11, 2008 the Plaintiffs filed this ERISA action to collect withdrawal liability from Defendant.
2. Defendant was properly served on July 24, 2008 (R. 8), but has failed to answer or otherwise plead within the time allowed by Rules 12 and therefore is in default.

**WHEREFORE**, Plaintiffs respectfully request:

- (A) That Defendant be adjudged to be in default.
- (B) That a default judgment be entered against Defendant in conformity with the relief requested in Plaintiffs' Complaint.

Respectfully submitted,

/s/ Thomas J. Angell  
Thomas J. Angell  
Attorney for Plaintiffs  
Jacobs Burns Orlove Stanton & Hernandez  
122 S. Michigan Avenue, Suite 1720  
Chicago, IL 60603  
(312) 372-1646